

ISSUES AND PROGRAMS REPORT  
SECOND QUARTER  
1993

WTVE-TV51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER

"Recycling"

This PSA entitled, Recycling, shows an adult throwing away trash in a bag. A child tries moving it as it gets bigger, another child joins him and so on. Bob Casey is the spokesperson and tells the adults not to leave the children of the world holding the bag. Recycling now makes a difference.

"Take Pride"

This PSA entitled, Take Pride In America, tells the audience how much money we spend in cleaning U.S. signs, picking up parks and cleaning national monuments.

"Life In The Balance"

This PSA entitle "Life In The Balance" is encouraging the audience to help save the rain forest by buying a tape about the rain forest. All proceeds go to the "Save The Rain Forest" and the National Arbor Day Foundation.

## 8). ISSUE: CONCERNS OF THE HANDICAPPED

"T.E.C. Network"

WTVE-TV51 produced this thirty-second Public Service Announcement for the T.E.C. Mental Health Association of Southeastern Pennsylvania. The PSA. talks about the organization's efforts in conducting a study on mental patient families in Philadelphia in order to find out specific needs.

"Berks County Center For Independent Living (BCCIL)"

WTVE-TV produces this thirty second PSA in which disabled individuals can seek help and training to become self-sufficient.

## 9). ISSUE: CONCERNS OF YOUTH

"Underage Drinking - Don't Mess Up"

This PSA is directed at teenage American students who are either going to the prom or graduating and going to parties or the shore for a week. They want the students to remember not to drink and drive is stupid.



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY CENTER FOR IND. LIVING Length: :30  
(BCCIL)

04/03/93	04/14/93	04/24/93
03:24:41A	03:22:40A	05:51:00A
07:45:51A		03:24:36P
04:22:10P	04/15/93	
		04/25/93
04/04/93	07:56:21A	06:51:00A
03:26:26A	04/16/93	03:20:22P
04:25:00P	00:25:22A	04/26/93
04/06/93	05:24:48A	05:19:01A
07:49:06P	04/17/93	12:54:21P
04/07/93	04:24:06A	04/28/93
	11:45:51A	
04:21:47A	08:24:32P	03:22:45P
07:56:11P		
	04/18/93	04/29/93
04/08/93	04:24:28A	02:22:35A
06:54:24A	11:55:00A	12:54:20P
12:54:38P	08:21:25P	
11:22:23P		04/30/93
	04/19/93	03:18:26A
04/09/93	00:25:20A	06:18:15A
05:22:36A	05:25:28A	03:21:10P
	02:22:06P	
04/10/93		
07:51:10A	04/20/93	
05:25:23P	07:45:53A	
	02:23:52P	
04/11/93		
05:23:00P	04/21/93	
	10:53:45A	
04/12/93		
05:25:03A	04/23/93	
02:24:48P	05:18:41A	
	12:51:10P	
04/13/93		
03:22:37A		
02:55:50P		

Notary Signature

Date

1729 North Eleventh Street • Reading, PA 19604 • (215)921-9181 • FAX (215)921-9139



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY CENTER FOR IND. LIVING Length: :30

(BCCIL)

05/01/93	05/14/93	03:24:10P
		07:22:10P
02:21:20A	02:25:42A	09:54:50P
09:54:49A	02:24:42P	
		05/29/93
05/02/93	05/17/93	06:54:24A
02:24:55A	02:26:28A	11:58:54A
		03:54:24P
05/03/93	05/18/93	08:22:50P
03:22:27A	09:54:27A	05/30/93
06:21:37A		
12:21:50P	05/19/93	06:54:27A
	09:54:26A	11:56:27A
05/04/93		03:54:24P
03:21:57A	05/20/93	08:21:50P
06:22:54A	10:49:43A	05/31/93
12:21:12P		
	05/21/93	01:20:42A
05/05/93		07:56:26A
	04:21:04A	12:23:00P
03:24:03A		03:23:00P
06:22:30A	05/22/93	07:25:44P
12:22:21P		08:46:43P
	02:21:44P	
06/06/93		
	05/23/93	
01:21:00P		02:22:50P
05/08/93		
	05/24/93	
08:55:30A		04:22:24A
05/11/93		
	05/27/93	
05:22:58A		07:56:04A
		04:54:45P
05/12/93		08:15:12P
02:24:38A		
02:24:30P	05/28/93	
05/13/93	01:21:03A	
	07:55:18A	
05:20:47A	12:25:18P	

Notary Signature

Date

1729 North Eleventh Street • Reading, PA 19604 • (215)921-9181 • FAX (215)921-9139



## WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY CENTER FOR IND. LIVING Length: :30

(BCCIL)

06/01/93	06/08/93	06/14/93	06/22/93
01:24:55A	09:25:10A	01:22:55A	01:24:58A
06:26:26A	12:54:25P	09:24:25A	08:53:00A
07:50:46A	04:25:59P	01:26:22P	12:54:26P
12:20:47P	07:24:10P	08:46:51P	05:56:23P
03:23:03P	11:55:10P		10:22:57P
07:23:47P		06/15/93	
09:52:58P	06/09/93	01:22:57A	06/23/93
	06/03/93	09:24:56A	03:54:41A
	00:23:17A	01:26:26P	08:21:03A
	05:25:13A	08:47:22P	01:27:00P
08:56:22A	08:53:41A		10:56:28P
01:55:53P	12:54:27P	06/17/93	
05:21:16P	05:51:03P		06/24/93
10:25:51P	08:24:00P	08:54:32A	
		12:54:27P	03:54:59A
06/04/93	06/10/93	10:25:47P	08:22:32A
06:54:23A	04:22:33A		01:24:35P
10:24:50A	11:53:38A	06/18/93	10:56:17P
01:24:32P	06:25:55P	01:24:48A	
05:47:50P		06:50:58A	06/25/93
09:54:25P	06/11/93	12:54:26P	10:53:23P
		05:53:35P	
06/05/93	01:22:11A	10:23:00P	06/26/93
	09:26:25A		
06:51:00A	01:26:22P	06/19/93	03:25:20P
11:56:20A	08:46:30P		06:22:45P
03:54:22P		05:22:00A	
08:24:25P	06/12/93	11:20:10A	06/27/93
		03:21:00P	
06/06/93	08:20:20A	11:50:18P	03:25:25P
	02:23:00P		06:22:54P
06:51:00A	06:26:00P	06/20/93	
11:53:01A	11:48:30P	05:20:30A	06/28/93
03:54:23P		03:22:00P	10:50:11P
	06/13/93	11:56:30P	
06/07/93	02:25:19P		06/29/93
06:54:26A	06:25:52P	06/21/93	10:49:15P
10:20:47A	11:48:03P		
01:24:18P		01:20:30A	06/30/93
05:45:48P		08:50:09A	
09:54:26P		12:54:27P	03:25:55A
		03:22:10P	03:23:50P
Notary Signature	05:47:57P	Date	

1729 North Eleventh Street • Reading, PA 19604 • (215)921-9181 • FAX (215)921-9139

ISSUES AND PROGRAMS REPORT

THIRD QUARTER

1993

WTVE-TV 51

1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

OCTOBER, 1993

## 8). ISSUE: CONCERNS OF THE HANDICAPPED

T.E.C. Network

WTVE-TV 51 produced this thirty-second Public Service Announcement for the T.E.C. Mental Health Association of Southeastern Pennsylvania. The PSA. talks about the organization's efforts in conducting a study on mental patient families in Philadelphia in order to find out specific needs.

Berks County Center for Independent Living

WTVE-TV 51 produced this thirty-second Public Service Announcement to alert the audience about the opportunities for handicapped care at the Berks County Center for Independent Living. The PSA. shows how disabled individuals can seek help and training to become self-sufficient.

Obsessive Compulsive Disorders

This thirty-second Public Service Announcement, entitled "Disorder", is aimed at viewers who are afflicted or know of someone afflicted with obsessive compulsive disorders. Termed the "silent epidemic", the PSA. helps alert the audience of the disorder and urges them to call a toll-free number in order to seek help.

RP Foundation for Fighting Blindness

WTVE-TV 51 aired this thirty-second Public Service Announcement sponsored by the RP Foundation for Fighting Blindness. Entitled "Ushers", the PSA. delivers an educational message about the Foundation's unprecedented groundwork into fighting Usher's Syndrome. Children with Usher's Syndrome are born with little or no hearing and slowly go blind from RP. The RP Foundation for Fighting Blindness is involved in combating the disease through research and technology.



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the following dates & times:

Title: BCCIL (Berks County Center For Independent Living

Length: 30 seconds

07/01/93 10:56:15P	07/15/93 03:54:15P 10:54:30P	07/28/93 01:24:51P 08:23:25P	08/09/93 01:55:07A 06:54:24A 05:23:00P	08/20/93 04:22:43A	09/01/93 04:22:37A 11:24:15A 09:54:26P	09/10/93 01:20:25A 07:48:48A
07/02/93 00:22:05A 08:23:00P	07/16/93 03:54:25P 10:56:30P	07/29/93 03:23:37A 10:22:13A	08/10/93 00:20:50A 04:24:26A	08/21/93 00:25:10A 07:52:22P 11:52:31P	09/02/93 04:24:00A 11:23:04A	09/11/93 04:22:55A 08:51:40A 04:46:29P
07/03/93 04:24:00A 06:54:55P	07/19/93 03:24:53P 10:56:40P	07/30/93 05:22:06A	08/22/93 05:46:53A 03:26:18P	08/22/93 00:25:11A 07:48:10P 11:53:30P	09/03/93 01:21:45A 04:24:45A 06:54:50P 11:49:05P	09/12/93 04:26:18A 08:43:38A 04:49:00P 09:54:40P
07/04/93 04:24:30A 06:54:25P	07/20/93 00:23:01A 05:24:57A 06:54:30P	07/31/93 04:22:39A 06:25:53P	08/12/93 00:24:00A 04:55:24A 09:25:54P	08/12/93 00:24:00A 04:55:24A 09:25:54P	08/23/93 04:19:56A	09/13/93 01:23:59A 07:54:02A
07/05/93 00:26:55A 12:25:54P	07/21/93 05:20:43A 11:23:25P	08/01/93 04:23:57A 06:25:15P	08/13/93 03:19:33A 11:25:14A 07:53:00P	08/24/93 03:26:00A 05:20:58A	09/04/93 00:21:52A 04:48:39A	09/13/93 01:23:59A 07:54:02A
07/07/93 00:22:38A 05:22:39A	07/22/93 00:54:21A 04:55:31A	08/02/93 05:22:18A	08/14/93 04:24:03A 11:24:10P	08/25/93 00:27:05A	09/05/93 00:20:21A 04:51:38A	09/14/93 01:24:01A 07:58:44A
07/09/93 01:22:31A 05:21:59A	07/24/93 04:49:44A 08:30:00A 08:25:11P	08/03/93 03:21:55A 06:54:21A	08/15/93 04:21:40A 11:23:40P	08/26/93 00:20:49A 05:25:29P	09/06/93 01:28:02A 04:23:00A 03:54:45P 11:56:00P	09/15/93 00:23:42A 01:22:27A 07:53:53A
07/10/93 04:22:22A		08/04/93 09:22:09P	08/16/93 03:23:30A 11:24:25P 07:56:20P	08/27/93 03:25:06A 03:24:06P	09/07/93 01:28:15A 04:22:37A 06:54:46P 11:54:30P	09/16/93 00:24:59A 05:25:30A 10:56:20P
07/11/93 04:25:00A 06:54:25P	07/25/93 04:48:29A 08:23:30A 08:22:11P	08/05/93 04:25:58A 09:28:24P	08/17/93 02:45:34A 04:54:21P 09:21:47P	08/28/93 02:53:57A	09/08/93 01:26:53A 04:23:45A 06:54:40P 11:53:00P	09/17/93 00:21:31A 05:25:38A 07:47:08A
07/12/93 00:22:20A 05:21:01A	07/26/93 00:54:26A 11:25:57P	08/06/93 01:58:26A 06:54:25A 05:20:05P	08/18/93 02:20:34A	08/29/93 02:56:31A		
07/13/93 05:56:28A	07/27/93 00:54:30A 03:25:00A 10:21:05A	08/07/93 05:23:57A 03:54:20P	08/19/93 04:24:04A 07:25:51P	08/30/93 03:19:11A 03:24:10P 10:55:57P	09/09/93 00:54:47A 05:25:12P 09:28:15P	
07/14/93 05:23:52A 06:54:10P 10:20:10P		08/08/93 05:23:55A 03:54:22P				

1729 North Eleventh Street • Reading, PA 19604 • (215) 921-9181 • FAX (215) 921-9139





WTVE • Reading Broadcasting, Inc.

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Title: BCCIL (Berks County Center For Independent Living) Length: 30 seconds

09/19/93 09/30/93  
04:23:15A 08:23:46A  
08:51:01A 01:26:17P  
11:28:14A 11:58:20P  
04:56:40P  
09:54:40P

09/20/93  
00:26:14A  
05:29:26A  
07:56:44A

09/21/93  
04:20:06A  
12:54:44P

09/22/93  
04:24:14A  
12:53:00P  
11:49:00P

09/23/93  
00:23:48A

09/24/93  
04:25:16A  
01:25:05P

09/25/93  
00:22:30A  
08:25:40P

09/26/93  
00:20:42A  
04:56:43A  
08:23:00P

09/27/93  
01:22:59P

09/28/93  
07:23:59A  
10:24:45A

09/29/93  
11:56:32P

1729 North Eleventh Street • Reading, PA 19604 • (215) 921-9181 • FAX (215) 921-9139

ISSUES AND PROGRAMS REPORT

FOURTH QUARTER

1993

WTVE-TV 51

1729 NORTH ELEVENTH STREET

READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

OCTOBER, 1993

RP Foundation for Fighting Blindness - "Ushers"

WTVE-TV 51 aired this thirty-second Public Service Announcement sponsored by the RP Foundation for Fighting Blindness. Entitled "Ushers", the PSA delivers an educational message about the Foundation's unprecedented groundwork into fighting Usher's Syndrome. Children with Usher's Syndrome are born with little or no hearing and slowly go blind from RP. The RP Foundation for Fighting Blindness is involved in combating the disease through research and technology.

Berks County Center For Independent Living (BCCIL)

WTVE produced this thirty second PSA featuring the BCCIL, in which disabled individuals can seek help and training to become self-sufficient.

8). ISSUE: CONCERNS OF YOUTH

YMCA Health Fair

The YMCA's "Health Fair" on October 6, 1993 is promoted. Through Chyron information, brief exercise B-roll video and a voice over, the time place and services provided are given. Services, such as blood pressure and cholesterol monitoring, body fat assessment and aerobics, exercise equipment demonstrations are listed and many, it is indicated, are free of charge. Finally, the address and phone of the YMCA is given in voice over and Chyron for further follow-up by the viewer.

Take 3 - #13 "College Food Safety"

Hosts Jeremy Posey & Eric Troop speak with guest Susan Conley, USDA Meat & Poultry Hotline. They discuss the do's and don't's of food safety especially in the dorm setting.

Take 3 - #14 "Space Camp"

Hosts Jeremy Posey & Eric Troop speak with guest Terre Zerman about the overview of the Space Camp program for students gifted in science.

Leadership For Learning & American Association of School Administrators

This 30 second PSA is about a young hearing-impaired youth, Kimberly Williams, who overcome her disability to become one of the nine national rodeo queen winners and winner of the Discover Card Tribute Award. She credits much of her success to the active support of her family.

ISSUES AND PROGRAMS REPORT  
FIRST QUARTER  
1994

WTVE-TV51-TV 51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER

## 7). ISSUE: CONCERNS OF THE HANDICAPPED

"T.E.C. Network"

WTVE-TV51-TV 51 produced this thirty-second Public Service Announcement for the T.E.C. Mental Health Association of Southeastern Pennsylvania. The PSA. talks about the organization's efforts in conducting a study on mental patient families in Philadelphia in order to find out specific needs.

"Berks County Center For Independent Living (BCCIL)"

WTVE-TV51 produced this thirty second in which disabled individuals can seek help and training to become self-sufficient.

## 8). ISSUE: CONCERNS OF YOUTH

Take 3 - #13 "College Food Safety"

Hosts Jeremy Posey & Eric Troop speak with guest Susan Conley, USDA Meat & Poultry Hotline. They discuss the do's and don't's of food safety especially in the dorm setting.

"Better Hearing"

This PSA from the Better Hearing Institute, is made to inspire young hard of hearing viewers to go get their hearing tested. They use Shelly Beatte who is hard of hearing showing kids it's okay to wear hearing aids.

"Youth Corp (PAB)"

This PSA entitled "Youth Corp" was sent from the Pennsylvania Association of Broadcasters and is aimed at youths ages 14-25. This PSA is asking the youth to call the Youth Corp for work that is fun and challenging and you get to know yourself better.

"Flashback"

"Flashback" from Boystown International focuses on a young girl's anguish over her relationships with boyfriend, parents and friends at school. It shows how any child through young adulthood can get help through this toll free number.

**Exhibit 30 DEPOSITION OF RAY M. SCHACHT  
OCTOBER 21, 1999, 9:55 A.M.**

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of : MM Docket No. 99-153  
READING BROADCASTING, INC. :  
For Renewal of License of : No. BPCT-940407KF  
Station WTVE (TV), Channel 51 :  
Reading, Pennsylvania :  
and : File No. BPCT-940630KG  
ADAMS COMMUNICATIONS CORPORATION :  
For Construction Permit for a :  
New Television Station to :  
Operate on Channel 51, Reading, :  
Pennsylvania :

Oral Deposition of RAY M. SCHACHT

APPEARANCES:

HOLLAND & KNIGHT, LLP For Reading Broadcasting,  
By: Thomas J. Hutton, Esquire Inc.  
2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037-5564

Berks Court Reporting Service  
By: Rachelle D. Hirneisen, RMR  
12 Pacific Avenue  
Sinking Spring, Pennsylvania  
(610) 678-9984

COPY

Federal Communications Commission	
Docket No. <u>MM-9153</u>	Exhibit No. <u>30</u>
Presented by <u>Reading</u>	
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input checked="" type="checkbox"/>
Reporter <u>John Del Pino</u>	
Date <u>6-12-00</u>	



1 APPEARANCES (Continued):

2 BECHTEL & COLE, CHARTERED For Adams Communications  
 3 By: Gene A. Bechtel, Esquire  
 4 1901 L Street, N.W., Suite 250  
 5 Washington, D.C. 20036

5 TAKEN AT:

6 Comfort Inn 9:55 a.m.  
 7 2200 Stacy Drive Thursday,  
 8 Reading, Pennsylvania October 21, 1999

10 I N D E X

11 <u>WITNESS</u>	12 <u>EXAMINED BY</u>	13 <u>PAGE</u>
14 Ray M. Schacht	Mr. Bechtel	3
	Mr. Hutton	7
	Mr. Bechtel	11

16 EXHIBITS

17 <u>NUMBER</u>	18 <u>DESCRIPTION</u>	19 <u>PAGE</u>
20 Schacht 1	Notice of Deposition	3
21 Schacht 2	Subpoena	3
22 Schacht 3	Programs/Issues Reports	
	3rd Quarter 1989 -	
	3rd Quarter 1994	7

RAY M. SCHACHT,

(Whereupon, the Reporter marked the following  
dentification: Schacht Exhibit No. 1, Notice of  
hacht Exhibit No. 2, Subpoena.)

BY MR. BECHTEL:

A Ray M. Schacht, 31 Pine Street, Breinigsville,  
Pennsylvania.

Q My name's Gene Bechtel. I'm counsel for Adams Communications Corporation. This is Mr. Hutton, counsel for Reading Broadcasting Company. If any of my questions are unclear, say so. If Mr. Hutton interjects after I ask a question, wait until we get through talking. If you need a break, let us know.

A        Okay.    Sure.

Q I believe you received the deposition notice, which is Exhibit 1 which you've been handed?

A Yes, I did.

Q And you were served the subpoena, which is Exhibit 2?

1           A       Correct.

2           Q       Thank you. Did you bring any documents with you  
3 as called for in the subpoena?

4           A       No, I didn't.

5           Q       Do you have any documents in your possession as  
6 called for in the subpoena?

7           A       No. I kept -- I kept notes on the programming  
8 that I did and then in -- I think it was December of '98, the  
9 program was discontinued and the station had taken on Hispanic  
10 programming and there really was no point in keeping -- you  
11 could only keep so much, so there was no point in keeping all  
12 these notes. So I didn't anticipate going back because of the  
13 programming, so I threw them away. So I -- I have no records,  
14 other than what I recollect.

15          Q       I wish I could get you to speak with Mrs.  
16 Bechtel about throwing things away.

17          A       Well, my wife has that problem with me and  
18 that's why I'm throwing things away.

19          Q       Okay. You make reference to a program that you  
20 did. What was the program that you did?

21          A       Well, over the years I had done several public  
22 affairs, public service programs. The last we did was a  
23 Senior Update. We had been doing general public affairs, and  
24 Dan Bendetti and I sat down one day and talked about filling a  
25 need, and we came up with the fact that the senior population

1 was growing so rapidly that it might behoove us to program to  
2 the seniors information that they weren't aware of, that  
3 wasn't available to them. The possibility being if we could  
4 help one person, we've done a good job. So the latter part of  
5 the programming was aimed at the senior citizen.

6 Q And when did the programming, the original  
7 programming you're referring to, when did it commence?

8 A Oh, it must have been three or four years ago.

9 Q You know as indicated in the subpoena and the  
10 notice we're primarily interested in a five year period that  
11 ended in August of 1994.

12 A Um-hum.

13 Q Did this program commence that far ago, if you  
14 can remember?

15 A No. It began after '94.

16 Q And before August of 1994, did you have a  
17 program on television station Channel 51?

18 A No, I didn't. I'm -- I'm speaking from memory  
19 now. I'm pretty sure I wasn't there in '94.

20 Q All right.

21 A As far as I can recollect. And prior to 199 --  
22 prior to that I wasn't there. I had my own business in  
23 Allentown.

24 MR. BECHTEL: Let's go off the record a moment.

25 (Discussion was held off the record.)

1 BY MR. BECHTEL:

2 Q During the period when you were involved in the  
3 program Senior Update, what was your position at the station?

4 A I just came in. I produced the program. I  
5 found the people and the problems and I arranged for the  
6 people to come in and did the program, and I did that on a  
7 monthly basis. I was paid \$50 to do it, to do a program -- I  
8 guess we did two or three. \$50 to do that. But other than  
9 that I had nothing to do with the station.

10 Q And is it your testimony that you produced two  
11 or three of these programs; is that correct?

12 A At a sitting, yes.

13 Q At a sitting?

14 A Yeah.

15 Q I reckon when we get to the exhibit we'll find  
16 out how far back it goes.

17 How long were the programs as aired?

18 A 30 minutes.

19 Q 30 minute programs?

20 A What we usually had was three guests in 30  
21 minutes.

22 Q Were they broadcast live or were they taped and  
23 then - - -

24 A We taped them. There's always a problem of  
25 getting people when you need them to do it live. So

1 appointments were made in advance so we could have them there  
2 to record.

3 Q Did you ever do a live program on the station?

4 A No, I didn't.

5 Q Do you know if the station did any live programs  
6 during that time frame?

7 A I don't know. I wasn't there long enough to see  
8 what was going on. I went in and did my programs and left.

9 MR. BECHTEL: I think this deposition will go  
10 most expeditiously if I defer to Mr. Hutton who does have the  
11 exhibit which gives us some of the details, and so I will  
12 conclude my questioning, subject to redirect based on anything  
13 that he comes up with. Okay?

14 MR. HUTTON: I'd like to have this marked as --  
15 Schacht Exhibit 3 is it?

16 (Whereupon, the Reporter marked Schacht Exhibit  
17 No. 3 for identification, Programs/Issues Reports 3rd Quarter  
18 1989 - 3rd Quarter 1994.)

19 BY MR. HUTTON:

20 Q Mr. Schacht, for clarification, have you also in  
21 your career used the name Carl Stewart professionally?

22 A Well, if you look at my name you realize it's  
23 next to impossible to pronounce and totally impossible to  
24 spell. So when I did the program I used the name Carl  
25 Stewart.

1           Q       Okay. The document consists of excerpts of  
2       WTVE's quarterly issues and programs list from the period of  
3       1993, the first quarter, through the third quarter of 1994.

4           A       Um-hum.

5           Q       I'd like you to review the third page of that  
6       document as well as the fourth page and the fifth page of that  
7       document and tell me if this corresponds with your  
8       recollection of the program that you aired or that you  
9       produced.

10          A       Page 4 and 5?

11          Q       The number at the bottom of the page is 5, 6 and  
12       7.

13          A       Okay.

14                   (Witness reviewed document.)

15                   I recollect a good deal of it. There's no way I  
16       could recollect -- remember all of it. But there's a good  
17       deal of it that I do recollect that I did, yes.

18          Q       Do you see any errors in what's depicted here?

19          A       No, I do not.

20          Q       Now, moving on to the second quarter of 1993.  
21       I'd like you to review the pages marked 11, 12, and 13 and  
22       tell me whether or not the description appearing there under  
23       the issue of Concerns of the Elderly corresponds with your  
24       recollection of the programs you produced for the station  
25       during that time period.

1           A       (Witness reviewed document.)

2                   Yeah. They look -- as far as I can recollect  
3 they look like my programs.

4           Q       Do you see any errors in those?

5           A       No, I don't.

6           Q       Turning now to the third quarter of 1993, I'd  
7 like you to review the pages marked 9, 10 and 11 and tell me  
8 whether or not the description appearing there corresponds  
9 with your recollection of the programs that you produced for  
10 the station during that time period.

11          A       (Witness reviewed document.)

12                   As far as I can recollect, I -- I'm familiar  
13 with some of those programs that I did, yes.

14          Q       Do you see any errors in those descriptions?

15          A       No.

16          Q       Turning now to the first quarter of 1994, I'd  
17 like you to review the description appearing under the issue  
18 Concerns of the Elderly appearing on the page marked 10 and  
19 tell me whether or not that corresponds with your recollection  
20 of the programs you produced during that time period.

21          A       (Witness reviewed document.)

22                   Yes. Um-hum.

23          Q       Do you see any errors in that description?

24          A       No, I don't.

25          Q       Turning now to the fourth quarter of 1993, I'd



1 like you to review the description appearing on Pages 10 and  
2 11 under issue Concerns of the Elderly and tell me whether or  
3 not those descriptions correspond with your recollection of  
4 the programs you produced during that time period.

5 A (Witness reviewed document.)

6 Yeah. Yeah. As I say, as far as I -- I can  
7 recollect, and I'm working from memory, they are some of my  
8 programs.

9 Q And do you see any errors appearing on these  
10 pages?

11 A No, I don't.

12 Q Turning now to the second quarter of 1994, I'd  
13 like you to review the pages -- they don't contain pagination.  
14 I'd like you to review the narrative description appearing  
15 under Item 6, issue, Concerns of the Elderly, and tell me  
16 whether or not that description corresponds with your  
17 recollection of the programs you produced for the station  
18 during that time period.

19 A Yes. Yeah. They're mine.

20 Q Okay. And do you see any errors appearing - - -

21 A No, sir, I don't.

22 Q - - - on those pages?

23 With respect to these programs, did the station  
24 just air each one once or did they air each segment multiple  
25 times?